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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

“JENNY”, “CARRIE”, “LILY”, “SARAH”,
“HENLEY”, “MAUREEN” and “JANE
ROE” as next friend for “PIA”,

Plaintiffs,

v.

THOMAS BLAHA,

Defendant.

Case No: 2:23-cv-07051-HG

**DECLARATION OF DEBORAH A.
BIANCO IN SUPPORT OF MOTION TO
PROCEED WITH PSEUDONYMS**

**DECLARATION OF DEBORAH A. BIANCO IN SUPPORT OF MOTION TO
PROCEED WITH PSEUDONYMS**

DEBORAH A. BIANCO hereby declares the following to be true and correct under penalty of perjury of the laws of the State of Washington and under 28 U.S.C. §1746.

1. I make this declaration in support of Plaintiffs’ motion to proceed in this matter using pseudonyms.

2. Though not of record in this case, I represent the Plaintiffs “Henley” of the BluePillow1 series, “Maureen” of the Lighthouse1 series, and “Pia” of the Sweet White Sugar series. Each of the plaintiffs were sexually exploited when they were minor children. Images of Plaintiffs’ sexual abuse are circulated and traded on the internet by pedophiles, such as the

defendant, who was convicted of child pornography crimes, and who, possessed images of Henley, Maureen, and Pia.

3. Henley, Maureen, and Pia are each victims of multiple child sex abuse material (CSAM) offenses committed in multiple states around the country.

4. I have represented Henley since 2019. I have represented Pia since 2016. I have represented Maureen since 2017. I have submitted requests for restitution in state and federal criminal courts in many jurisdictions on Henley, Maureen, and Pia's behalf. In each of these requests, a pseudonym has been used in order to protect their anonymity.

5. I also represent many other victims of child pornography, for whom I regularly submit restitution requests to courts throughout the United States. No court has yet ordered that any of these victims use his or her legal name in any court proceeding.

6. Henley, Maureen, and Pia are each real individuals whom I have personally met. Each has significant psychological injuries resulting from the child pornography related crimes of which she is a victim. Like other victims of these crimes, these young women fear the prospect of the consumers of the images of their sexual abuse seeking them out and attempting to initiate contact with them or sexually assault them. Pia is a minor; Maureen and Henley are adults. Each of these victims of image exploitation crimes lives in fear of unwanted contact from someone who has seen their images. Each believes that exposing their legal names to the public record puts them in physical danger and would compound the emotional harms that they suffer.

7. Henley, Maureen, and Pia have been in counseling to try to recover from the emotional problems they have because of the image exploitation crimes against them. It is going to take each of them many years of counseling to cope with the harms that she has suffered, and which she continues to suffer as a result of the ongoing circulation of the images of her abuse.

8. Henley, Pia and Pia's legal guardian are very afraid to have their legal names linked with the fact they are child pornography victims or to allow any information about their identities to be publicly revealed. Because Pia lives with her legal guardian, revelation of the guardian's legal name could easily lead to Pia's legal name and location. Maureen is equally afraid to reveal any information about her true identity, where she lives, or other information that might enable predators to locate her.

9. Henley, Maureen, Pia, and Pia's legal guardian request permission to use pseudonyms herein in order to protect themselves from harassment, injury, ridicule, and personal embarrassment.

DATED this 22nd day of September 2023 at Bellevue, Washington.

DEBORAH A. BIANCO, P.S.

/s/ Deborah A. Bianco

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